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IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

HILDA ADRIANA PANCHAME,

Plaintiff,

v.

TARGET COPORATION,

CIVIL DIVISION

Defendant.

CASE NO.:

COMPLAINT FOR DAMAGES AND DEMAND FOR JURY TRIAL

The Plaintiff, HILDA ADRIANA PANCHAME, by and through the undersigned counsel, hereby sues the Defendant, TARGET COPORATION and alleges:

1. This is an action for damages which exceeds Thirty Thousand Dollars (\$30,000.00) exclusive of interest and costs, and otherwise within this Court's jurisdictional limits.

2. At all times material hereto, the Plaintiff, HILDA ADRIANA PANCHAME, was and is a resident of Broward County, Florida, and is otherwise *sui juris*.

3. At all times material hereto, the Defendant, TARGET COPORATION, was and is a foreign corporation doing business in Broward County, Florida.

4. Venue is proper in this County in that the Defendant does business in Broward County, Florida, and/or all of the acts complained of herein occurred in Broward County, Florida.

5. On or about December 24, 2020, the Plaintiff, HILDA ADRIANA PANCHAME, was a business invitee of the Defendant, TARGET COPORATION, at its premises located at 16901 Miramar Parkway, Miramar, Florida.

6. At all times material hereto, and specifically on December 24, 2020, Defendant, TARGET COPORATION, owned, managed, controlled, operated, and/or maintained the premises located at 16901 Miramar Parkway, Miramar, Florida.

7. On or about December 24, 2020, the Plaintiff, Hilda Adriana Panchame, was lawfully present at Defendant, TARGET COPORATION'S, aforementioned premises, when she slipped in liquid and fell.

8. The Defendant owed to its business invitees a duty to provide a reasonably safe environment.

9. The Defendant, its agents, servants or employees, breached its duty owed to the Plaintiff by negligently maintaining its premises in the following manner:

a. By failing to maintain the floor of the premises in a reasonably safe condition, to wit, allowing liquids and/or other substances to accumulate on the floor, and to prevent dangerous conditions from occurring; and/or

b. By failing to warn of the dangerous condition that existed at the time of the Plaintiff's incident; and/or

c. Failing to place barricades, wet floor signs, or other marking devices utilized to alert customers such as the Plaintiff of the dangerous condition that existed at the time of Plaintiff's incident; and/or

d. By failing to remove said liquid or other substance from the floor of the premises; and/or

e. By failing to correct the hazardous condition of the premises when the Defendant knew or should have known that the general public visits said premises and specifically the Plaintiff herein; and/or

f. Was otherwise negligent in the care, maintenance, and upkeep of the premises, and specifically by allowing a liquid and/or another substance to be left on the floor of the premises so as to cause the Plaintiff to fall.

10. That the Defendant knew or in the exercise of reasonable care should have known of the existence of the hazardous and dangerous condition and the condition had existed for a sufficient length of time that the Defendant knew or should have known of the condition and could have easily remedied it; and/or

11. That the dangerous condition occurred with such frequency that owner should have known of its existence.

12. As a direct and proximate result of the aforementioned negligence of the Defendant, TARGET COPORATION, the Plaintiff, HILDA ADRIANA PANCHAME, sustained severe, grievous and permanent injuries, physical and mental pain and suffering, disability, physical impairment, disfigurement, mental anguish, inconvenience, loss of capacity for the enjoyment of life, loss of earnings and impairment of earning capacity and/or permanent aggravation of a pre-existing condition, and further incurred hospital bills, medical bills, and/or other bills as a result of said injuries; said injuries are either permanent or continuing in their nature and the Plaintiff, HILDA ADRIANA PANCHAME will suffer the losses into the future.

DEMAND FOR JURY TRIAL

The Plaintiff, HILDA ADRIANA PANCHAME, hereby demands trial by jury of all issues so triable as a matter of right.

Dated: _____

RUBENSTEIN LAW, P.A.

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